

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S MOTION *IN LIMINE* NO. 17**

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of Defendants Uber Technologies,
7 Inc. And Ottomotto LLC's Third Supplemental Responses To Waymo's Second Set Of Common
8 Interrogatories (Nos. 4-7), filed under seal.

9 3. Attached as Exhibit 2 is a true and correct copy of Defendants Uber Technologies,
10 Inc. And Ottomotto LLC's Fifth Supplemental Responses To Waymo's First Set Of Common
11 Interrogatories (Nos. 1-3).

12 4. Attached as Exhibit 3 is a true and correct copy of transcript excerpts from the
13 Video-Recorded Deposition Of James Haslim, taken on August 9, 2017 and filed under seal.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 DATED: September 13, 2017

17 /s/ Jeff Nardinelli
Jeff Nardinelli

18
19 **SIGNATURE ATTESTATION**

20 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
21 filing of this document has been obtained from Jeff Nardinelli.

22
23 /s/ Charles K. Verhoeven
Charles K. Verhoeven
24
25
26
27
28